

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HUSSEIN ROBINSON,	:	
	:	
	:	
Plaintiff,	:	No.
	:	
	:	
v.	:	
	:	
	:	
WILLIAM WOOLEMS, DEALER'S CHOICE	:	
TRUCKWAY, TRUCKMOVERS.COM, INC.,	:	
and TRUCKMOVERS HOLDINGS, LLC,	:	
	:	
Defendants.	:	

NOTICE OF REMOVAL

TO THE CLERK OF COURT:

Pursuant to 28 U.S.C. § 1441, Defendants William Woolems, Dealers' Choice Truckaway System, Inc. d/b/a "Truckmovers" (improperly pled as "Dealer's Choice Truckway") (hereinafter "Dealers' Choice"), Truckmovers.com, Inc., and Truckmovers Holdings, LLC, by and through their undersigned counsel, Weber Gallagher Simpson Stapleton Fires & Newby, LLP, hereby remove the case captioned Hussein Robinson v. William Woolems, et al, Court of Common Pleas, Philadelphia County, August Term 2021, No. 01909 (the "State Court Action"), from the Court of Common Pleas of Philadelphia County, where it is now pending, to the United States District Court for the Eastern District of Pennsylvania, and as grounds for removal states as follows:

1. Plaintiff initiated the State Court Action by filing a Complaint against Defendants on or about August 20, 2021.

2. Plaintiff's Complaint was the first pleading that contained any information about the claimed damages and the nature of the Plaintiff's claims against Defendants, and the first pleading from which the basis of removal could be determined.

3. In accordance with 28 U.S.C. § 1446(a), true and correct copies of Plaintiff's Complaint, along with all other process, pleadings, and orders served upon Defendants are attached hereto as Exhibit "A." A copy of the docket in the State Court Action is attached as Exhibit "B."

4. Plaintiff alleges Defendant William Woolems negligently changed lanes and caused his motor vehicle to strike Plaintiff's motor vehicle. See Exhibit "A" at ¶ 26, 37.

5. In Count I, Plaintiff alleges that Defendant Woolems' negligence caused him to suffer injuries and damages in excess of \$50,000. Id. at Count I.

6. Plaintiff contends Defendants Dealers' Choice, Truckmovers.com, Inc., and Truckmovers Holdings, LLC, negligently entrusted the motor vehicle to Defendant Woolems. Id. at ¶39.

7. In Count II, Plaintiff alleges that the negligence of Defendants Dealers' Choice, Truckmovers.com, Inc., and Truckmovers Holdings, LLC caused him to suffer injuries and damages in excess of \$50,000. Id. at Count II.

8. Plaintiff contends Defendants Dealers' Choice, Truckmovers.com, Inc., and Truckmovers Holdings, LLC, are liable for Defendant Woolems' alleged negligence pursuant to the doctrine of *respondeat superior*, causing injuries and damages in excess of \$50,000. Id. at Count III.

9. Furthermore, upon information and belief, Plaintiff's claims include a workers compensation lien in an amount in excess of \$80,000.

10. The entire State Court Action is removable to this Court pursuant to 28 U.S.C. § 1441, as this Court has original jurisdiction under 28 U.S.C. § 1332.

DIVERSITY AS A BASIS FOR JURISDICTION

11. This Court has original jurisdiction over the State Court Action pursuant to 28 U.S.C. § 1332(a)(1) because there is complete diversity between Plaintiff and Defendants, and the amount in controversy, exclusive of interest and costs, exceeds the sum or value of \$75,000.00.

12. Plaintiff is a citizen of the State of Pennsylvania. Id. ¶ 1.

13. Upon information and belief, Defendant Woolems is a citizen of Virginia.

14. Defendant Dealers' Choice Truckaway System, Inc. is a Kansas corporation, with a principal place of business at 2310 South Redwood Avenue, Independence, Missouri 64057.

15. Defendant Truckmovers.com, Inc. is a Missouri corporation, with a principal place of business at 2310 South Redwood Avenue, Independence, Missouri 64057.

16. Defendant Truckmovers Holdings, LLC is a Delaware corporation with a principal place of business at 2310 South Redwood Avenue, Independence, Missouri 64057.

17. Complete diversity of citizenship exists between Plaintiff and Defendants.

18. Pursuant to 28 U.S.C. § 1441(b), the State Court Action is removable because no party in interest properly joined and served as a Defendant is a citizen of Pennsylvania.

19. Under 28 U.S.C. § 1446(c) “[i]f removal of a civil action is sought on the basis of jurisdiction conferred by section 1332(a), the sum demanded in good faith in the initial pleading shall be deemed to be the amount in controversy, except that – (A) the notice of removal may assert the amount in controversy if the initial pleading seeks – (i) nonmonetary relief; or (ii) a money judgment, but the State practice either does not permit demand for a specific sum or

permits recovery of damages in excess of the amount demanded; and (B) removal of the action is proper on the basis of an amount in controversy asserted under subparagraph (A) if the district court finds, by the preponderance of the evidence, that the amount in controversy exceeds the amount specified in section 1332(a).”

20. Here, Plaintiff’s Complaint demands damages “in an amount in excess of fifty-thousand dollars (\$50,000.00)” in each of the three counts of the Complaint.

21. Furthermore, Plaintiff has alleged a workers compensation lien totaling over \$80,000.

22. Thus, Plaintiff’s request for damages exceeds the \$75,000.00 amount in controversy requirement.

23. Accordingly, the amount in controversy requirement of 28 U.S.C. § 1332 has been satisfied.

OTHER PROCEDURAL MATTERS

24. Pursuant to 28 U.S.C. § 1446(a), the United States District Court for the Eastern District of Pennsylvania is the appropriate court for filing a Notice of Removal from the Court of Common Pleas of Philadelphia County, Pennsylvania where the State Court Action is pending.

25. Service of the Complaint upon Defendant Woolems was completed on or about August 25, 2021.

26. Service of the Complaint upon Defendant Dealers’ Choice was completed on or about August 27, 2021.

27. Service of the Complaint upon Defendant Truckmovers.com, Inc. was completed on or about August 27, 2021.

28. Service of the Complaint upon Defendant Truckmovers Holdings, LLC was completed on or about August 25, 2021.

29. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b).

30. Contemporaneous with the filing of this Notice, Defendants have given written notice hereto to Plaintiff, and Defendants will file a true and correct copy of this Notice of Removal with the Court of Common Pleas of Philadelphia County as required by 28 U.S.C. § 1446(d).

WHEREFORE, Defendants William Woolems, Dealers' Choice Truckaway System, Inc., Truckmovers.com, Inc., and Truckmovers Holdings, LLC submit this Notice that the State Court Action is removed from the Court of Common Pleas of Philadelphia County to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

**WEBER GALLAGHER SIMPSON
STAPLETON FIRES & NEWBY, LLP**

/s/ *Laura A. Seider*

June J. Essis, Esquire
Laura A. Seider, Esquire
2000 Market Street, Suite 1300
Philadelphia, PA 19103
Attorneys for Defendants

Date: September 22, 2021

CERTIFICATE OF SERVICE

I, Laura A. Seider, Esquire, hereby certify that on this 22nd day of September, 2021, I caused to be served a true and correct copy of the foregoing Notice of Removal via E-Mail, upon the following:

Joseph F. Schwartz, Esquire
Silver & Silver
42 W. Lancaster Avenue, 3rd Floor
Ardmore, PA 19003
Attorney for Plaintiff

**WEBER GALLAGHER SIMPSON
STAPLETON FIRES & NEWBY, LLP**

/s/ *Laura A. Seider*

June J. Essis, Esquire
Laura A. Seider, Esquire
2000 Market Street, Suite 1300
Philadelphia, PA 19103
Attorneys for Defendants

Exhibit

“A”

SILVER & SILVER

By: Joseph F. Schwartz, Esq.
 Identification No.: 87550
 42 W. Lancaster Ave., Third Floor
 Ardmore, PA 19003
 (610) 658 - 1900

JURY TRIAL DEMANDED

Filed and Attested by the
 Office of Judicial Records
 Attorney for Plaintiff 20 AUG 2021 09:35 pm



HUSSEIN ROBINSON	:	COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
4347 N. 6 th Street	:	
Philadelphia, PA 19140	:	
v.	:	August Term 2021
WILLIAM WOOLEMS	:	
6485 Sandy Ford Road	:	
Blue Ridge, VA 24064	:	No.
and	:	
DEALER'S CHOICE TRUCKWAY	:	
2310 S. Redwood Ave.	:	
Independence, MO 64057	:	
and	:	
TRUCKMOVERS.COM, INC.	:	
2310 S. Redwood Ave.	:	
Independence, MO 64057	:	
and	:	
TRUCKMOVERS HOLDINGS, LLC	:	
c/o Registered Agent Solutions	:	
9 E. Lockerman Street, Suite 311	:	
Dover, DE 19901	:	
and	:	
JOHN DOE 1	:	
Owner of Truck Driven by Mr. Woolems	:	
and	:	
JOHN DOE 2	:	
Employer of Mr. Woolems	:	

COMPLAINT IN CIVIL ACTION
2V- MOTOR VEHICLE ACCIDENT

NOTICE

"You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

"YOU SHOULD TAKE THIS PAPER TO YOUR

AVISO

"Lo han demandado en la corte. Si usted quiere defenderse de estas demandas expuestas en las siguientes páginas, usted debe tomar una medida dentro de 20 días de la fecha de esta demanda y de la fecha que fue notificado de este aviso, asentando su comparecencia personal por escrito o que un abogado presente al tribunal por escrito sus defensas o objeciones a las demandas expuestas en contra de usted. Se le advierte que si usted falla de hacerlo, el caso puede seguir adelante sin usted y se puede asentar un fallo en el tribunal sin una notificación adicional por cualquier dinero reclamado en la demanda o sin que ninguna otra demanda o descargo sea pedida por el demandante. Usted puede perder dinero o sus propiedades u otros derechos importantes suyos.

LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

PHILADELPHIA BAR ASSOCIATION
Lawyer Referral & Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
Telephone (215) 238-1701

"USTED DEBE LLEVAR ESTE DOCUMENTO INMEDIATAMENTE A SU ABOGADO. SI NO TIENE UN ABOGADO VAYA A O LLAME A LA OFICINA ABAJO INDICADA. ESTA OFICINA LE PUEDE PROPORCIONAR CON LA INFORMACIÓN SOBRE COMO CONTRATAR UN ABOGADO.

SI USTED NO TIENE DINERO PARA CONTRATAR A UN ABOGADO, ESTA OFICINA LE PUEDE PROPORCIONAR CON LA INFORMACIÓN SOBRE LAS AGENCIAS QUE LE PUDIERAN OFRECER SERVICIOS LEGALES A PERSONAS A UN HONORARIO REDUCIDO O SIN COBRARLE UNO.

La Asociación de Abogados de Filadelfia
El Departamento de Remisión a Abogados y
Servicios de Información
One Reading Center
Filadelfia, Pennsylvania 19107
Teléfono: (215) 238-1701

SILVER & SILVER
By: Joseph F. Schwartz, Esq.
Identification No.: 87550
42 W. Lancaster Ave., Third Floor
Ardmore, PA 19003
(610) 658-1900

JURY TRIAL DEMANDED

Attorney for Plaintiff

HUSSEIN ROBINSON	:	COURT OF COMMON PLEAS
4347 N. 6 th Street	:	OF PHILADELPHIA COUNTY
Philadelphia, PA 19140	:	
v.	:	August Term 2021
WILLIAM WOOLEMS	:	
6485 Sandy Ford Road	:	No.
Blue Ridge, VA 24064	:	
and	:	
DEALER'S CHOICE TRUCKWAY	:	
2310 S. Redwood Ave.	:	
Independence, MO 64057	:	
and	:	
TRUCKMOVERS.COM, INC.	:	
2310 S. Redwood Ave.	:	
Independence, MO 64057	:	
and	:	
TRUCKMOVERS HOLDINGS, LLC	:	
c/o Registered Agent Solutions	:	
9 E. Lockerman Street, Suite 311	:	
Dover, DE 19901	:	
and	:	
JOHN DOE 1	:	
Owner of Truck Driven by Mr. Woolems	:	
and	:	
JOHN DOE 2	:	
Employer of Mr. Woolems	:	

COMPLAINT IN CIVIL ACTION
2V- MOTOR VEHICLE ACCIDENT

Plaintiff, by his undersigned counsel brings this action against the above captioned Defendants, and in support thereof avers as follows:

1. Plaintiff, Hussein Robinson, is an adult individual residing at the above captioned address.
2. Defendant William Woolems (hereinafter "Defendant Woolems") is an adult individual residing at the above listed address.

3. Defendant Dealer's Choice Truckway (hereinafter "Defendant DCT") is a business corporation registered to do business in Pennsylvania with its registered address at the above captioned address.

4. Upon information and belief, Defendant DCT regularly conducts business in Philadelphia County.

5. Defendant Truckmovers.Com, Inc. (hereinafter "Defendant TCI") is a business corporation registered to do business in Pennsylvania with its registered address at the above captioned address.

6. Upon information and belief, Defendant TCI regularly conducts business in Philadelphia County.

7. Defendant Truckmovers Holdings, LLC (hereinafter "Defendant THL") is a business corporation registered to do business in Pennsylvania with its registered address at the above captioned address.

8. Upon information and belief, Defendant THL regularly conducts business in Philadelphia County.

9. Defendant John Doe 1 is the owner of the truck being operated by Defendant Woolems.

10. Upon information and belief, Defendant John Doe 1 regularly conducts business in Philadelphia County.

11. Defendant John Doe 2 is the entity that employed Defendant Woolems at the time of the accident.

12. Upon information and belief, Defendant John Doe 2 regularly conducts business in Philadelphia County.

13. This litigation arises out of a motor vehicle accident that took place on or about October 21, 2019 on I-81 North near Shippensburg, PA.

14. At all times material hereto, Plaintiff was the operator of a white International Tractor Trailer (hereinafter "Plaintiff's Vehicle").

15. At all times material hereto, Defendant Woolems was the operator of an Orange Volo Tractor Trailer (hereinafter "Defendants' Vehicle").

16. Upon information and belief, at all times relevant hereto, Defendants' Vehicle was owned by Defendant DCT.

17. Upon information and belief, at all times relevant hereto, Defendants' Vehicle was owned by Defendant TCI.

18. Upon information and belief, at all times relevant hereto, Defendants' Vehicle was owned by Defendant THL.

19. Upon information and belief, at all times relevant hereto, Defendants' Vehicle was owned by Defendant John Doe 1.

20. Upon information and belief, at all times relevant hereto, Defendant Woolems was the employee, agent, contractor or servant of Defendant DCT.

21. Upon information and belief, at all times relevant hereto, Defendant Woolems was the employee, agent, contractor or servant of Defendant TCI.

22. Upon information and belief, at all times relevant hereto, Defendant Woolems was the employee, agent, contractor or servant of Defendant THL.

23. Upon information and belief, at all times relevant hereto, Defendant Woolems was the employee, agent, contractor or servant of Defendant John Doe 2.

24. At all times material hereto, Defendant Woolems was acting within the course and scope of his employment.

25. The scope and employment of Defendant Woolems employment included permission to utilize Defendants' Vehicle.

26. At the aforementioned time and place, Defendant Woolems improperly changed lanes, causing Defendants' Vehicle to collide with Plaintiff's vehicle.

27. As a result of this collision, Plaintiff has suffered personal injuries, including, but not limited to, cervical radiculopathy, lumbar radiculopathy, lumbar disc injuries, and injuries to his neck, midback and low back.

28. At all times material hereto, Plaintiff acted in a reasonable and prudent manner, was in no way negligent, and in no manner caused or contributed to the happening of this collision.

29. The accident and Plaintiff's injuries were directly and proximately caused by the negligence of the Defendants and were due in no manner to any act or omission on the part of the Plaintiff.

30. At all times material hereto, Plaintiff did not assume the risk of his injuries.

31. As a direct and proximate result of the tortious conduct of Defendants, Plaintiff has suffered in the past, and in the future will continue to suffer great pain, agony, mental anguish, and a diminution of his ability to enjoy life and life's pleasures.

32. As a further result of tortious conduct of Defendants, Plaintiff has been and will in the future be compelled to expend large sums of money for medical treatments and diagnostics, in an effort to permanently and thoroughly cure himself of the injuries and/or sufferings brought about as a result of the accident.

33. As a direct and proximate result of the tortious conduct of Defendants Plaintiff was unable to work due to his injuries and incurred significant wage loss.

34. As a direct and proximate result of the tortious conduct of Defendants a workers' compensation lien in excess of \$80,000 is being asserted for indemnity and medical payments made due to the injuries Plaintiff sustained in this matter.

35. As a direct and proximate result of the tortious conduct of Defendants, Plaintiff has incurred in the past and will continue to incur in the future, other financial expenses or losses, including lost wages and diminished earning capacity, which do or will exceed the amount which he may otherwise be entitled to recover.

COUNT I – NEGLIGENCE
Hussein Robinson v. William Woolems

36. The preceding paragraphs are incorporated by reference as if set forth fully below.

37. The aforementioned collision was the direct and proximate result of the negligent operation of the motor vehicle by Defendant Woolems in that he:

- a. Failed to apply his brakes in time to avoid said collision;
- b. Negligently applied his brakes to avoid said collision;
- c. Operated the vehicle in careless disregard for the safety or persons or property in violation of 75 Pa. Cons. Stat. § 3714;
- d. Failed to steer the vehicle in a manner so as to avoid said collision;
- e. Permitted and allowed Defendants' vehicle to strike and collide with Plaintiff's vehicle;
- f. Failed to keep a reasonable lookout for other vehicles;
- g. Failed to adequately observe Plaintiff's vehicle;
- h. Although he saw or should have seen Plaintiff's vehicle, failed to slacken speed, turn vehicle, or take any other evasive action in an attempt to avoid the collision;
- i. Failed to have his vehicle under proper and adequate control;
- j. Improperly and unsafely changed lanes in violation of 75 Pa. Cons. Stat. § 3309.

WHEREFORE, Plaintiff Hussein Robinson requests this Honorable Court to enter judgment in his favor against Defendant William Woolems in an amount in excess of \$50,000.00 in compensatory damages in addition to interest, costs, and delay damages pursuant to Pa. R.C.P. 238.

COUNT II – NEGLIGENCE

Hussein Robinson v. Dealer's Choice Truckway; Truckmovers.Com, Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2

38. The preceding paragraphs are incorporated by reference as if set forth fully below.

39. The aforementioned collision was the direct and proximate result of the negligent action by Defendants Dealer's Choice Truckway; Truckmovers.Com, Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2 in that they:

- a. Negligently entrusted the Volvo Tractor Trailor to Defendant Wollems for use when it knew, or with reasonable exercise of due care, should have known, that the operator was not capable of operating the motor vehicle properly;
- b. Negligently entrusted the Volvo Tractor Trailor to Defendant Wollems for use when it knew, or in the exercise of reasonable care, should have known the operator was going to operate the vehicle in an negligent manner;
- c. Negligently entrusted the Volvo Tractor Trailor to Defendant Wollems for use without regard for the safety of other drivers, specifically, Plaintiff; and
- d. Negligently employed Defendant Wollems with the responsibility of operating a motor vehicle.

40. As a direct and proximate result of the negligence of Defendants Dealer's Choice Truckway; Truckmovers.Com, Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2, Plaintiff sustained personal injuries and damages as described herein.

WHEREFORE, Plaintiff Hussein Robinson requests this Honorable Court to enter judgment in his favor against Defendants Dealer's Choice Truckway; Truckmovers.Com,

Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2 in an amount in excess of \$50,000.00 in compensatory damages in addition to interest, costs, and delay damages pursuant to Pa. R.C.P. 238.

COUNT III – NEGLIGENCE

Hussein Robinson v. Dealer's Choice Truckway; Truckmovers.Com, Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2

41. The preceding paragraphs are incorporated by reference as if set forth fully below.

42. The aforementioned collision was the legal responsibility of Defendants Dealer's Choice Truckway; Truckmovers.Com, Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2 pursuant to *respondeat superior* in that their employee, servant, or agent, Defendant Wollems, was in the scope and course of his employment at the time of the accident and acted negligently and carelessly to cause this accident.

WHEREFORE, Plaintiff Hussein Robinson requests this Honorable Court to enter judgment in his favor against Defendants Dealer's Choice Truckway; Truckmovers.Com, Inc.; Truckmovers Holdings, LLC; John Doe 1 and John Doe 2 in an amount in excess of \$50,000.00 in compensatory damages in addition to interest, costs, and delay damages pursuant to Pa. R.C.P. 238.

SILVER & SILVER

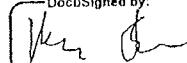
Joseph F. Schwartz Esq.

Joseph F. Schwartz, Esquire
Attorney for Plaintiff

Dated: 8/20/21

VERIFICATION

I, Hussein Robinson, hereby verify that the statements made in the foregoing Complaint are and correct to the best of my knowledge, information and belief. I understand that the statements made herein are subject to penalties of 18 Pa. C.S.A. Sec. 4904, relating to unsworn falsification to authorities.

DocuSigned by:

B4DAG6EBSAF064D2...
Hussein Robinson

Date: 8/17/2021

Exhibit

“B”



No Items in Cart [LOGOUT](#) Header

[Civil Docket Report](#)

A \$5 Convenience fee will be added to the transaction at checkout.

Case Description

Case ID: 210801909
Case Caption: ROBINSON VS WOOLEMS ETAL
Filing Date: Friday , August 20th, 2021
Court: MAJOR JURY-STANDARD
Location: City Hall
Jury: JURY
Case Type: MOTOR VEHICLE ACCIDENT
Status: WAITING TO LIST CASE MGMT CONF

Related Cases

No related cases were found.

Case Event Schedule

No case events were found.

Case motions

No case motions were found.

Case Parties

Seq #	Assoc	Expn Date	Type	Name
1			ATTORNEY FOR PLAINTIFF	SCHWARTZ, JOSEPH F
	Address: 42 W. LANCASTER AVE. THIRD FLOOR ARDMORE PA 19003 (610)658-1900 jschwartz@silverandsilver.com		Aliases: none	
2	1		PLAINTIFF	ROBINSON, HUSSEIN
	Address: 4347 N. 6TH STREET PHILADELPHIA PA 19140		Aliases: none	
3			DEFENDANT	WOOLEMS, WILLIAM
	Address: 6485 SANDY FORD ROAD		Aliases: none	

9/21/21, 12:13 PM

Civil Docket Report

BLUE RIDGE VA 24064

4			DEFENDANT	DEALER'S CHOICE TRUCKWAY
Address:	2310 S. REDWOOD AVE. INDEPENDENCE MO 64057	Aliases:	<i>none</i>	
5			DEFENDANT	TRUCKMOVERS.COM INC
Address:	2310 S. REDWOOD AVE. INDEPENDENCE MO 64057	Aliases:	<i>none</i>	
6			DEFENDANT	TRUCKMOVERS HOLDINGS LLC CO REGISTERED AGENT SOLUTIONS
Address:	9 E. LOCKERMAN STREET SUITE 311 DOVER DE 19901	Aliases:	<i>none</i>	
7			DEFENDANT	DOE 1, JOHN
Address:	NO ADDRESS NO CITY PA No Zip	Aliases:	<i>none</i>	
8			DEFENDANT	DOE 2, JOHN
Address:	NO ADDRESS NO CITY PA No Zip	Aliases:	<i>none</i>	
9			TEAM LEADER	ANDERS, DANIEL J
Address:	529 CITY HALL PHILADELPHIA PA 19107	Aliases:	<i>none</i>	

Docket Entries

Filing Date/Time	Docket Type	Filing Party	Disposition Amount	Approval/Entry Date
20-AUG-2021 03:38 PM	ACTIVE CASE			20-AUG-2021 04:13 PM
Docket Entry:	E-Filing Number: 2108039930			

20-AUG-2021 03:38 PM	COMMENCEMENT CIVIL ACTION JURY	SCHWARTZ, JOSEPH F		20-AUG-2021 04:13 PM
Documents:	Click link(s) to preview/purchase the documents Final Cover		 Click HERE to purchase all documents related to this one docket entry	
Docket Entry:	none.			
20-AUG-2021 03:38 PM	COMPLAINT FILED NOTICE GIVEN	SCHWARTZ, JOSEPH F		20-AUG-2021 04:13 PM
Documents:	Click link(s) to preview/purchase the documents MVA complaint H Robinson.pdf		 Click HERE to purchase all documents related to this one docket entry	
Docket Entry:	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED.			
20-AUG-2021 03:38 PM	JURY TRIAL PERFECTED	SCHWARTZ, JOSEPH F		20-AUG-2021 04:13 PM
Docket Entry:	12 JURORS REQUESTED.			
20-AUG-2021 03:38 PM	WAITING TO LIST CASE MGMT CONF	SCHWARTZ, JOSEPH F		20-AUG-2021 04:13 PM
Docket Entry:	none.			
01-SEP-2021 10:28 AM	AFFIDAVIT OF SERVICE FILED	SCHWARTZ, JOSEPH F		01-SEP-2021 10:29 AM
Documents:	Click link(s) to preview/purchase the documents Aff of Service - Woolems.pdf		 Click HERE to purchase all documents related to this one docket entry	
Docket Entry:	AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON WILLIAM WOOLEMS BY CERTIFIED MAIL, FIRST CLASS REGULAR MAIL ON 08/25/2021 FILED. (FILED ON BEHALF OF HUSSEIN ROBINSON)			
01-SEP-2021 10:30 AM	AFFIDAVIT OF SERVICE FILED	SCHWARTZ, JOSEPH F		01-SEP-2021 10:31 AM
Documents:	Click link(s) to preview/purchase the documents Aff of Service - Dealers Choice.pdf		 Click HERE to purchase all documents related to this one docket entry	
Docket	AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON DEALER'S			

9/21/21, 12:13 PM

Entry: CHOICE TRUCKWAY BY CERTIFIED MAIL,FIRST CLASS REGULAR MAIL ON 08/27/2021 FILED. (FILED ON BEHALF OF HUSSEIN ROBINSON)				
01-SEP-2021 10:33 AM	AFFIDAVIT OF SERVICE FILED	SCHWARTZ, JOSEPH F		01-SEP-2021 10:34 AM
Documents:	Click link(s) to preview/purchase the documents <u>Aff of Service - Truckmovers.pdf</u>			 Click HERE to purchase all documents related to this one docket entry
Docket Entry:	AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON TRUCKMOVERS.COM INC BY CERTIFIED MAIL,FIRST CLASS REGULAR MAIL ON 08/27/2021 FILED. (FILED ON BEHALF OF HUSSEIN ROBINSON)			
01-SEP-2021 10:35 AM	AFFIDAVIT OF SERVICE FILED	SCHWARTZ, JOSEPH F		01-SEP-2021 10:36 AM
Documents:	Click link(s) to preview/purchase the documents <u>Aff of Service - Truckmovers Holdings.pdf</u>			 Click HERE to purchase all documents related to this one docket entry
Docket Entry:	AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON TRUCKMOVERS HOLDINGS LLC CO REGISTERED AGENT SOLUTIONS BY CERTIFIED MAIL,FIRST CLASS REGULAR MAIL ON 08/25/2021 FILED. (FILED ON BEHALF OF HUSSEIN ROBINSON)			

[Case Description](#)[Related Cases](#)[Event Schedule](#)[Case Parties](#)[Docket Entries](#)[E-Filing System](#)[Search Home](#)

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I.(a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.

Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.

PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.

VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.

VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. Related Cases. This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

APPENDIX I

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

Hussein Robinson	:	CIVIL ACTION
	:	
v.	:	
William Woolems, Dealer's Choice	:	
Truckway, Truckmovers.com, Inc.,	:	NO.
Truckmovers Holdings, LLC		

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See §1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. §2241 through §2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2 ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (x)

September 22, 2021

Date
215-972-7920
Telephone

/s/ Laura A. Seider

Attorney-at-law
215-564-7699
FAX Number

Defendants

Attorney for
lseider@wgllaw.com
E-Mail Address

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 4347 N. 6th Street, Philadelphia, PA 19140

Address of Defendant: 2310 S. Redwood Avenue, Independence, MO 64057

Place of Accident, Incident or Transaction: Interstate I-81 North, near Shippensburg, PA.

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when **Yes** is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

I certify that, to my knowledge, the within case is / is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: September 22, 2021

Laura A. Seider
Attorney-at-Law / Pro Se Plaintiff

308971

Attorney I.D. # (if applicable)

CIVIL: (Place a ✓ in one category only)

A. Federal Question Cases:

- 1. Indemnity Contract, Marine Contract, and All Other Contracts
- 2. FELA
- 3. Jones Act-Personal Injury
- 4. Antitrust
- 5. Patent
- 6. Labor-Management Relations
- 7. Civil Rights
- 8. Habeas Corpus
- 9. Securities Act(s) Cases
- 10. Social Security Review Cases
- 11. All other Federal Question Cases
(Please specify): _____

B. Diversity Jurisdiction Cases:

- 1. Insurance Contract and Other Contracts
- 2. Airplane Personal Injury
- 3. Assault, Defamation
- 4. Marine Personal Injury
- 5. Motor Vehicle Personal Injury
- 6. Other Personal Injury (Please specify): _____
- 7. Products Liability
- 8. Products Liability – Asbestos
- 9. All other Diversity Cases
(Please specify): _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, _____, counsel of record or pro se plaintiff, do hereby certify:

- Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:
- Relief other than monetary damages is sought.

DATE: _____

Sign here if applicable

Attorney-at-Law / Pro Se Plaintiff

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.